

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

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**DOCKET NO. 15-11**

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**IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**INFORMAL DOCKET NO.: 1953(I)**

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**KAIRAT NURGAZINOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**COMPLAINANTS' REPLY TO RESPONDENTS' RECENT SUBMISSION**

Complainants respectfully submit this response to Mr. Jeffrey's latest submission (styled as "Reply to Complainants' Motion for Who Knows What"), now coming virtually hourly, in the above referenced matter.

Complainants confess to being at a complete loss as to how to deal with Mr. Jeffrey, his continuing violations of the Rules of Practice and Procedure, his continuing delusions regarding Mr. Katz, his vituperative personal attacks, and his unending submissions to the Presiding Officer in this matter.

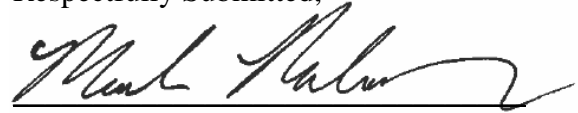
It is respectfully submitted that Mr. Jeffrey's most recent submission to which this responds, once stripped of emotional venting and meandering on a multitude of issues, says *nothing*. Accordingly, no further rejoinder is merited or required.

In closing, we note Mr. Jeffrey's willingness to submit to competency test, and suggest that same be conducted at the earliest available opportunity in the best interests of his client.

Finally, as to Mr. Jeffrey's bizarre reference to a "prank", at no time have complainants ever filed any submissions, or authored any correspondence inclusive of the email at issue as a "prank". Indeed, complainants and their counsel take the irrational and unstable actions of Mr. Jeffrey most seriously. It is respectfully requested that the Presiding Officer issue a directive precluding any further submissions by either party in this matter pending rulings and decisions on the motions presently at bar.

Dated: September 2, 2016  
Brooklyn, New York

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Marcus A. Nussbaum', written over a horizontal line.

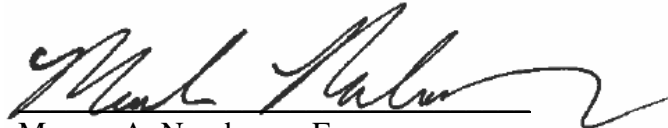
Marcus A. Nussbaum, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the **COMPLAINANTS' REPLY TO RESPONDENTS' RECENT SUBMISSION** upon Respondents' Counsel at the following address:

Nixon Peabody LLP  
Attn: Eric C. Jeffrey, Esq.  
799 9th Street NW, Suite 500  
Washington, DC 20001-4501

by first class mail, postage prepaid, and by email (ejeffrey@nixonpeabody.com).

A handwritten signature in black ink, appearing to read "Marcus A. Nussbaum", written over a horizontal line.

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Dated: September 2, 2016 in Brooklyn, New York.